

MEMO ENDORSED

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
*Executive Director
and Attorney-in-Chief*

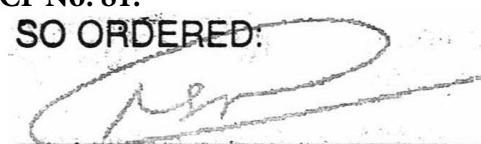
Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

The Honorable Nelson S. Román
United States District Court Judge
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Vania Bell
19 CR 550 (NSR)

Deft. has failed to present to the Court with a legal or medical basis which warrants the granting of her application seeking to further stay her surrender date to begin serving her sentence following her conviction. Accordingly, the application is DENIED. Clerk of Court is requested to terminate the motion at ECF No. 81.

Dated: White Plains, NY **SO ORDERED:**
Feb. 14, 2023



HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Dear Honorable Román:

I am writing to ask that Your Honor please postpone Vania Bell's surrender date to early March. As you know, Ms. Bell's original surrender date was January 17, 2023, but, as detailed in my January 13th submission, on January 12, 2023, Ms. Bell [REDACTED]. See ECF # 75. As a result, Ms. Bell's surrender date was delayed until January 31, 2023. See ECF # 76. But Ms. Bell was still sick in late January, so Your Honor postponed Ms. Bell's surrender date to February 15, 2023. See ECF # 79.

Unfortunately, Ms. Bell continues to struggle from [REDACTED]. As detailed by Ms. Bell's doctor, Ms. Bell "[REDACTED]," and is suffering from "[REDACTED]" [REDACTED]." See February 14, 2023, Letter from Gabriela Wojnarska-Alvarez MD (Exhibit A). Due to her condition, Ms. Bell's physician has advised that she [REDACTED]. The doctor also opined that [REDACTED]

[REDACTED]." Ms. Bell is also awaiting the results of a [REDACTED]. *Id.* [REDACTED]

[REDACTED]. Under these circumstances, and especially in light of Ms. Bell's pre-existing conditions,¹ as well as the [REDACTED]

¹ As noted in the PSR, Ms. Bell is [REDACTED]. PSR ¶ 77. According to [REDACTED]

(last assessed on February 13, 2023).

[REDACTED]² I ask that the Court please delay Ms. Bell's surrender until early March. This is essential both [REDACTED]

I have communicated with Margery Feinzig from the United States Attorney's Office and provided the Government with the attached documentation from Ms. Bell's physician, but I do not yet know the Government's position regarding this request.³

Thank you for your consideration of this request.

Sincerely,

//s

Benjamin Gold
Assistant Federal Defender

cc: Senior Litigation Counsel Margery Feinzig

² See [REDACTED]

³ This is not surprising, as I only received this attached letter at 1:14pm, so I do not know if the Government has even been able to review the e-mail that I sent.

Exhibit A

Letter from Gabriela Wojnarska-Alvarez, MD



DOCTORS
PRIMARY CARE AND NEPHROLOGY

HOSPITAL AFFILIATIONS:

 HackensackUMC
Where medicine meets innovation

2/14/2023

To whom it may concern:

My patient Name Bill Dob: [REDACTED]

[REDACTED]

[REDACTED]

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